

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

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U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

EUGENE DOKES AND
KENYOTA DOKES,

Defendant.

4:15CR545 CEJ/NAB

INDICTMENT

COUNTS ONE THROUGH FOUR

The Grand Jury charges:

A. Introduction

1. On January 7, 2005, **EUGENE DOKES** applied for disability benefits from the Social Security Administration. In doing so, he agreed to notify the Social Security Administration if his medical condition improved or he went to work in either an employee or self-employed capacity. **MR. DOKES** claimed that he could not be employed as his disability rendered him unable to concentrate and caused him to become aggressive.

2. After **MR. DOKES** had received benefits for several years, the administrative agency conducted a review in order to determine if the disabling condition continued. In his response, **MR. DOKES** asserted that his condition had worsened. In official reports to the Social Security Administration presented on May 10, 2010, **MR. DOKES** and his wife, **KENYOTA DOKES**, claimed that he: did not engage in any social activities, had lost any interest in family and friends; and, limited his hobbies and interests to playing video games and watching television.

3. When **MR. DOKES** reported self-employment income on 2011 tax returns, the Social Security Administration requested that he complete a form titled, "Work Activity Report-Self-Employment." On the completed form, **MR. DOKES** reported that the income at issue on his tax return was investment income stemming from the rental of a former residence. He also stated that he had not engaged in any work activity since December 2003.

4. In the course of an investigation into the conflicting information received, special agents employed by the Social Security Administration conducted a review of public sites in which **MR. and MRS. DOKES** posted information about themselves since being approved for disability benefits for **MR. DOKES** and their children. They claimed that **MR. DOKES** became a real estate agent for Coldwell Banker-Gundaker Realty in approximately 2006, and in 2008 started his own investment company as a licensed broker. He also stated that he earned: a bachelor's degree in Business Administration with minors in Psychology and Sociology from Columbia College; his master's degree in Business Administration from Lindenwood University; and, was a Ph.D. candidate. **MR. DOKES** also represented that he and his wife mentored teenagers, newlyweds, and new parents through their church. In addition to the employment, educational, and personal information provided, the search of internet sources revealed that **MR. DOKES**: had been a candidate for the State of Missouri House of Representatives; served as a member of the Missouri Advisory Board for United States Commission on Civil Rights; led the St. Charles County Republican Committee; wrote and published two books; and was the Chairman of the St. Charles County Republican Caucus.

5. Records filed with the Missouri Secretary of State demonstrated that between January 3, 2006 and April 19, 2013, **MR. DOKES** registered six for profit and not for profit companies, and three fictitious names related to political campaigns. According to the majority of the

records, he was the president and was the sole organizer of the enterprises. **MRS. DOKES** also served as an officer and board member of at least one of the enterprises.

6. Educational records from Lindenwood University and license records from the State of Missouri corroborated some of the claims made by **MR. DOKES**. In particular, **MR. DOKES** applied for admission to the Master's in Business Administration Program on January 24, 2008 claiming that he was a realtor with Coldwell Banker-Gundaker. His transcript revealed that he received his bachelor's degree in Business Administration from Columbia College with minors in Psychology and Sociology in May 2008. He completed the requirements for his master's degree in June of 2009. Between April of 2005 and July of 2014, **MR. DOKES** was licensed by the State of Missouri as a realtor, and then as a real estate broker. During those years, he maintained his license by participating in continuing education courses related to real estate.

7. As a result of the false statements regarding **MR. DOKES'** ability to function and daily activities, the Social Security Administration paid **MR. DOKES** and **MRS. DOKES** more than \$95,000.00 in federal disability benefits between October 27, 2006 and January 31, 2013.

B. On or about the following dates, within the Eastern District of Missouri, the defendants,

EUGENE DOKES AND KENYOTA DOKES,

being aided and abetted, counseled and induced by one another, did embezzle, steal, purloin, or knowingly convert to their use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: the listed amounts of government funds:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>
1	December 3, 2012	\$2,400.00

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>
2	December 3, 2012	\$1,228.00
3	January 3, 2013	\$1,095.00
4	January 3, 2013	\$ 600.00

All in violation of Title 18, United States Code, Sections 641 and 2.

A TRUE BILL.

FOREPERSON

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